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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

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11 COX COMMUNICATIONS LAS VEGAS, INC.,
12 Plaintiff,
13 v.
14 ZURICH AMERICAN INSURANCE
COMPANY,
15 Defendant.
16

Case No.: 2:13-CV-1483-GMN-NJK

**STIPULATION AND PROPOSED
ORDER TO EXTEND DISCOVERY
DEADLINES
(THIRD REQUEST)**

17 The parties hereby jointly stipulate to extend the discovery deadlines in this matter,
18 pursuant to Local Rule 26-4, respectfully showing as follows. The within Request is filed more
19 than 21 days prior to the present discovery cut-off of :

20 **1. Discovery completed to date:**

- 21 a. Initial disclosures of witnesses and documents by all parties;
22 b. Supplement disclosures of witnesses and documents by all parties;
23 c. Interrogatories and Requests to Produce to Plaintiff by Defendant, and responses
24 thereto;
25 d. Interrogatories and Requests to Produce to Defendant by Plaintiff, and responses
26 thereto;
27 e. Notices of depositions served on custodian of records, fact witnesses and FRCP

30(b)(6) witnesses;

f. Supplemental Interrogatories and Requests for Production;

g. Requests for Admissions.

2. Discovery remaining to be completed:

a. Completion of depositions of party representatives and fact witnesses

3. The reason discovery has not been completed:

Both parties have filed motions for summary judgment, and each party believes this case can be resolved in its favor as a matter of law. However, the parties have continued with discovery efforts, and numerous depositions have been noticed. Due to the number of depositions, the travel schedule of counsel, and the potential that some depositions may be conducted outside of Nevada, scheduling the depositions may prove difficult. As such, the parties request additional time to complete these depositions.

4. Proposed schedule for completing remaining discovery:

Discovery cut-off:

December 29, 2014

Last day to file dispositive motions:

January 28, 2015 (30 days after discovery cut-off)

Last day to file pre-trial order and FED. R. CIV. P. 26(a)(3) disclosures:

January 28, 2015, or 30 days after decision on any dispositive motions filed after the close of discovery

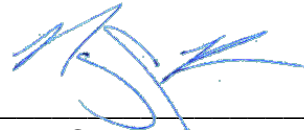
<p>Dated: July 29, 2014.</p> <p><u>/s/ Theodore J. Kurtz</u> Theodore J. Kurtz, Esq. SELMAN BREITMAN LLP 3993 Howard Hughes Pkwy., Suite 200 Las Vegas, NV 89169-0961</p> <p><i>Attorney for Defendant Zurich American Insurance Company</i></p>	<p>Dated: July 29, 2014</p> <p><u>/s/ Howard J. Russell</u> Howard J. Russell, Esq. WEINBERG, WHEELER, HUDGINS GUNN & DIAL, LLC 6385 S. Rainbow Blvd., Suite 400 Las Vegas, Nevada 89118</p> <p><i>Attorney for Plaintiff Cox Communications Las Vegas, Inc.</i></p>
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ORDER AMENDING SCHEDULING ORDER

For good cause shown, and on the stipulation of the parties, the Scheduling Order in this matter is hereby amended consistent with the schedule agreed to by the parties in Paragraph 4 above.

IT IS SO ORDERED:

DATED: July 30, 2014.



NANCY J. KOPPE
United States Magistrate Judge